

DALE K. KLEVEN, ESQ.
Nevada Bar No. 007778
THOMAS M. FRONCZEK, ESQ.
Nevada Bar No. 11380
RELIEF LAWYERS, LLC
5550 Painted Mirage Rd., Ste. 320
Las Vegas, Nevada 89149
Phone: (702) 589-7520
dale@relieflawyersnv.com

TOMIO B. NARITA, ESQ. (*pro hac vice*)
California Bar No. 156576
R. TRAVIS CAMPBELL, ESQ. (*pro hac vice*)
California Bar No. 271580
SIMMONDS & NARITA LLP
50 California Street, Suite 1500
San Francisco, CA 94111
Telephone: (415) 283-1000
Facsimile: (415) 352-2625

Attorneys for Plaintiff and Counter-Defendant
Troy Capital, LLC and Third-Party Defendants
Rance Willey and Troy Dupuis

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TROY CAPITAL LLC, a Nevada Limited
Liability Company,

Plaintiff,

vs.

PATENAUDE & FELIX APC, et al.,

Defendants.

CASE NO.: 2:20-cv-00205-JCM-DJA

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S MOTION
FOR RECONSIDERATION OF ORDER
ON MOTIONS FOR PARTIAL
SUMMARY JUDGMENT**

(First Request)

Current Deadline: November 2, 2022

New Deadline: November 9, 2022

The Hon. James C. Mahan

PATENAUDE & FELIX APC,

Counterclaimant/Third-Party
Plaintiff

vs.

TROY CAPITAL LLC, a Nevada Limited
Liability Company; RANCE WILLEY, an
Individual, and TROY DUPUIS, an Individual,

Counterdefendants/Third-Party
Defendants

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, the parties, through their respective counsel, stipulate to extend the time for Defendants to respond to Plaintiff's pending Motion for Reconsideration of Order on Motions for Partial Summary Judgment (ECF No. 153), which was filed on October 19, 2022. This is the parties' first request. Good cause for this stipulation exists based on the following:

1. On October 19, 2022, Plaintiff filed a Motion for Reconsideration of the Court's September 21, 2022 Order on the parties' motions for partial summary judgment. ECF No. 153.

2. Pursuant to the Court's Local Rules, Defendants' deadline to oppose the motion is November 2, 2022. L.R. 7-2(b). Plaintiff's deadline to file their reply is November 9, 2022. *Id.*

3. Good cause exists for a brief one-week extension of the deadlines. Defendants' counsel has been dealing with several pressing deadlines in other matters and, therefore, has not had sufficient time to dedicate to preparing Defendants' opposition brief. Accordingly, Defendants have requested, and Plaintiff has agreed, to extend the opposition deadline to the Motion for Reconsideration by one week to November 9, 2022.

4. Accordingly, the parties hereby stipulate and jointly request that the Court extend the deadline for Defendants to respond to Plaintiff's Motion for Reconsideration of Order on Motions for Partial Summary Judgment (ECF No. 153) to November 9, 2022, and extend the deadline for Plaintiff to file its reply to November 16, 2022.

5. This requested extension of time is not sought for delay or any other improper purpose. The parties respectfully submit that the reasons set forth above constitute good cause for the extension.

DATED this 28th day of October, 2022
SIMMONDS & NARITA LLP

DATED this 28th day of October, 2022
RELIEF LAWYERS, LLC

/s/R. Travis Campbell
Tomio B. Narita
(Admitted *pro hac vice*)
R. Travis Campbell
(Admitted *pro hac vice*)
44 Montgomery Street, Suite 3010
San Francisco, California 94104

/s/Dale K. Kleven
Dale K. Kleven
Nevada Bar No. 7778
Thomas M. Fronczek
Nevada Bar, No. 11380
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149

*Attorneys for Plaintiff/Counter-defendant
TROY CAPITAL, LLC and Third-Party Defendants
RANCE WILLEY and TROY DUPUIS*

*Attorneys for Plaintiff/Counterdefendant
TROY CAPITAL, LLC and Third-Party Defendants
RANCE WILLEY and TROY DUPUIS*

DATED this 28th day of October, 2022
SANTORO WHITMIRE

/s/Jason D. Smith
Nicholas J. Santoro
Nevada Bar No. 0532
Jason D. Smith
Nevada Bar No. 9691
10100 W. Charleston Boulevard, Suite 250
Las Vegas, Nevada 89135

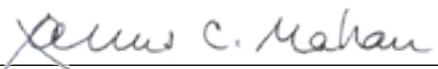
Attorneys for
Counterclaimant/Third-Party Plaintiff
PATENAUDE & FELIX APC

DATED this 28th day of October, 2022
LEWIS BRISBOIS BISGAARD &
SMITH LLP

/s/Jeffrey D. Olster
Jeffrey D. Olster
Nevada Bar No. 8864
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118

Attorneys for Defendants
PATENAUDE & FELIX APC, RAYMOND A.
PATENAUDE, MICHAEL D. KAHN and ANGIE
HONG HOAR

IT IS SO ORDERED:


JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE

DATED: October 31, 2022